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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE *2014 DEC -8 PM 2:37*
WESTERN DIVISION

THOMAS E. GOULD
CLERK, U.S. DISTRICT COURT
WD. OF TN, MEMPHIS

Toni Owens

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Amedisys Hospice

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff,

Toni Owens

(name of plaintiff)

is a citizen of the United States and resides at 3256 N Johnson Circle
(street address)

Memphis

(city)

Shelby

(country)

TN

(state)

38112

(zip code)

901- 650- 5386

(telephone number)

3. Defendant

Amedisys Hospice

(defendant's name)

lives at, or its business is located at

1355 Lynnfield Bl. B. Suite 120

(street address)

Memphis

Shelby

(street address)

TN

38119

(city)

(country)

(state)

(zip code)

4. Plaintiff sought employment from the defendant or was employed by the defendant at

1355 Lynnfield Bl. B- Suite 120

(street address)

Memphis

Shelby

TN

38119

(city)

(country)

(state)

(zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 15 March 2013

(day)

(month)

(year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 20 March 2013.

(day)

(month)

(year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 20 March 2013.

(day)

(month)

(year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 10 Sept 30 9 2014. (Attach a copy of the notice to this complaint.)

10 Sept 30 9 2014 (day) (month) (year)

9. Because of plaintiff's (1) race, (2) color, (3) sex, (4) religion, (5) national origin, defendant

(a) failed to employ plaintiff.

(b) terminated plaintiff's employment.

(c) failed to promote plaintiff.

(d)

10. The circumstances under which defendant discriminated against plaintiff were as follows: Their are or was 3 RN Case managers at the time I. White and a hispanic male. the female was white. and we were all on the computer which was new to the company. when the white female RN and myself went to the Nursing home or a Care home where there was more than one patient we got the computer signature page signed first and then we went to see the patient next. so the computer signature page might say 12pm, 12:01pm, 12:02pm for patient page. then when we say the patient the visit note might say 12:00pm - 1pm, 1pm - 1:30pm, 1:30pm - 2pm and so on until all the patients was entered. the unemployment office granted me my unemployment once I applied and gave me reason one times did not match and I have that letter.

11. The acts set forth in paragraph 9 of this complaint

- (a) are still being committed by defendant.
- (b) are no longer being committed by defendant.
- (c) may still be being committed by defendant.

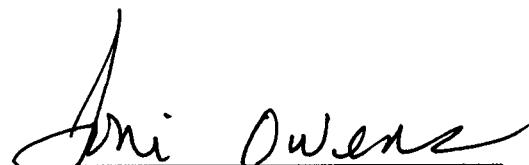
12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) Defendant be directed to employ plaintiff, or
- (b) Defendant be directed to re-employ plaintiff, or
- (c) Defendant be directed to promote plaintiff, or;
- (d) Defendant be directed to pay plaintiff for all missed work and clear my record and take the termination from my files

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes No



Lori Owens
SIGNATURE OF PLAINTIFF